RE: RM-11306, OBJECTION TO AND DISAGREEMENT WITH

Sirs:

I have been an FCC licensed amateur radio operator (K4EEG) for 47 years. I operate all modes: SSB phone, AM phone, CW, and Digital (Pactor I & II, RTTY).

I object to the proposed RM-11306 because intermixing of CW with wider bandwidth digital signals, in an even smaller band than is presently allocated as proposed by RM-1136, will cause an untenable level of interference to both modes.

Many of the digital modes are now being used in the Amateur bands in what are essentially radio email services (Sail Mail). This use of digital modes is likely to grow substantially in the future. CW and many digital modes are particularly interference prone to and from each other. If RM-11306 were adopted, it would create an untenable interference situation by placing CW operation and digital modes such as Pactor I, II, & III in an even smaller band allocation than presently provided under Part 97.

The present method of defining band allocations, based upon modes, is far superior. The present system insures that mode types which, based on actual operating experience, have proven particularly prone to interfere with one another, can be separated by frequency allocation assignment, as opposed to some abstract and meaningless measure such as bandwidth. The present approach of mode based allocation has served us well and should not be abandoned.

In fact, it would be a big improvement to expand the present mode based allocation system, and include separate band allocations for SSB and AM phone. A total of four allocations based on mode would be ideal: SSB phone, AM phone, CW, Digital. This would greatly reduce interference and conflict on the Amateur bands and insure maximum usefulness of the allocated spectrum.

I urge you not proceed with RM-11306.

The AARL submission of this proposal as defined in RM-11306 was done so without the consent, approval, or majority agreement of its membership. It does not represent the views of many of its members, of which I am one.

Respectfully Submitted,

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